2 3 4 5 6 7	J Christopher Jorgensen Nevada Bar No. 5382 Matthew R. Tsai Nevada Bar No. 14290 LEWIS ROCA ROTHGERBER CHRISTIE LLP 3993 Howard Hughes Parkway, Suite 600 Las Vegas, NV 89169 Phone: (702) 949-8200 Email: cjorgensen@lrrc.com Email: mtsai@lrrc.com Attorneys for Defendant Barclays Bank Delaware UNITED STATES I		
8	DISTRICT OF NEVADA		
9	ANDREI GRUIA, an individual;	Case No. 2:18-cv-2107-JCM-CWH	
10	Plaintiff,	STIPULATION AND ORDER TO EXTEND	
11		DEFENDANT BARCLAYS BANK DELAWARE'S TIME TO FILE RESPONSE	
	EQUIFAX INFORMATION SERVICES, LLC, a foreign limited-liability company; EXPERIAN	TO COMPLAINT	
	INFORMATION SOLUTIONS, INC., a foreign corporation; TRANS UNION LLC, a foreign	[FIRST REQUEST]	
	limited-liability company; BARCLAYS BANK DELAWARE, a foreign corporation; BERLIN-WHEELER, INC., a foreign corporation;		
16	CAPITAL ONE BANK (USA), N.A., a national		
	a national banking association; CITIBANK, N.A., a national banking association;		
	CONVERGENT OUTSOURCING, INC., a foreign corporation; DISCOVERY BANK, a		
19	foreign corporation; GRANT & WEBER, INC.; a domestic corporation; NRA GROUP, LLC dba		
20	NATIONAL RECOVERY AGENCY, a foreign limited-liability company; ONEMAIN		
21			
22	corporation; VERIZON WIRELESS SERVICES, LLC; a foreign limited-liability		
23	company; WEBBANK, a foreign corporation; WELLS FARGO BANK, N.A., a national banking association:		
24	banking association; Defendants.		
25	Detenualits.		
26	COME NOW Plaintiff Andrei Gruia ("Plaintiff") and Defendant Barclays Bank Delaware		
27	("Barclays"), by counsel and pursuant to Local Rule 6-1, and stipulate as follows:		
28	///		
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1	STIPULATION			
2	1. On November 1, 2018, Plaintiff filed a Complaint with this Court [ECF No. 1].			
3	2.	2. Barclays was served with the Complaint on November 13, 2018.		
4	3.	Barclays' response to the Complaint is due by December 4, 2018.		
5	4.	4. The parties are engaging in preliminary discussions in this matter. In order to		
6	explore the possibility of an early resolution, Barclays desires an extension until January 4, 2019 to			
7	file a response to the Complaint.			
8	5. Counsel for Barclays conferred with counsel for Plaintiff regarding this Stipulation.			
9	Counsel for Plaintiff agrees to the requested extension.			
10	6. This Stipulation is filed in good faith and not for dilatory or other improper purpose			
11	Plaintiff would not suffer any prejudice by the Court permitting Barclays the requested extension of			
12	time and has consented to the requested extension.			
13	7.	This is the first request for ex	xtension of time for Barclays to respond to the	
14	Complaint.			
15	DATED: Nove	ember 26, 2018.	DATED: November 26, 2018.	
16	/s/ Matthew R.	Tsai Jorgensen (NV Bar #5382)	/s/ Kevin L. Hernandez Kevin L. Hernandez (NV Bar No. 12594)	
17	J Christopher Jorgensen (NV Bar #5382) Matthew R. Tsai (NV Bar #14290) 3993 Howard Hughes Parkway, Suite 600 Las Vegas, NV 89169 Tel: 702-949-8200 Email: cjorgensen@lrrc.com Email: mtsai@lrrc.com		Law Office of Kevin L. Hernandez 2510 Wigwam Parkway, Suite 206	
18			Henderson, NV 89074 T: (702) 563-4450	
19			F: (702) 552-0408 kevin@kevinhernandezlaw.com	
20	Counsel for D		Counsel for Plaintiff Andrei Gruia	
21	Barclays Bank	z Delaware	Counsel for I tuning Amuret Grund	
22	<u>ORDER</u>			
23	IT IS SO ORDERED.			
24		.	INITED STATES MACISTRATE HIDGE	
25			JNITED STATES MAGISTRATE JUDGE November 27, 2018	
26		Γ	DATED:	
27				